



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 13, 2014, a true copy of the foregoing was filed in the United States District Court for the Western District of Missouri, Western Division, through the Court's electronic filing system to:

Terry L. Lawson, Jr.  
Steven A. Shepherd  
Lawson Law Center, LLC  
700 East 8th Street, Suite 300  
Kansas City, Missouri 64106  
[terry@llckc.com](mailto:terry@llckc.com)  
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*Attorneys for Plaintiff*

/s/Mayer S. Klein  
MAYER S. KLEIN



1331. Accordingly, this action may be removed to this Court, as provided by 28 U.S.C. § 1441(a).

#### **THE VENUE REQUIREMENT IS SATISFIED**

4. Venue of this removal is proper under 28 U.S.C. § 1441(a) because this Court is the United States District Court for the district and division corresponding to the place where the State Court action is pending.

#### **THE REMOVAL IS TIMELY**

5. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is filed within thirty (30) days after Defendant's receipt of the initial pleadings setting forth the claim for relief upon which this action is based.

#### **PAPERS FROM REMOVED ACTION**

6. Pursuant to 28 U.S.C. § 1446(a), attached hereto as Exhibit "A" are copies of the following documents which are all the process, pleadings and orders received by Defendant in this action.

#### **FILING OF REMOVAL PAPERS**

7. Under 28 U.S.C. § 1446(d), written notice of the removal of this action has been given simultaneously to Plaintiff's counsel, and a Notice to Clerk of removal has been simultaneously filed with the 16<sup>th</sup> Judicial Circuit Court of Jackson County, Missouri.

8. Upon receipt of this Notice, no further action shall be taken in the 16<sup>th</sup> Judicial Circuit Court of Jackson County, Missouri.

WHEREFORE, Defendant LVNV Funding, LLC, does hereby remove the above captioned action from the 16<sup>th</sup> Judicial Circuit Court of Jackson County, Missouri, and requests that further proceedings be conducted in this Court as provided by law.

Respectfully submitted this 13th day of August 2014.

FRANKEL, RUBIN, BOND, DUBIN,  
SIEGEL & KLEIN, P.C.

By: /s/ Mayer S. Klein  
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This is to certify that on August 13, 2014, I have filed electronically a copy of the within and foregoing Defendant's Notice of Removal in the United States District Court for the Western District of Missouri, Western Division through the Court's electronic filing system to:

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/s/Mayer S. Klein  
MAYER S. KLEIN